

A GRIFFIN LAWYERS

*Galveston Island
Galveston, Texas 77550*

March 30, 2009 - 9:00 A.M.

TO: SAM LIVELY
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FROM: ANTHONY P. GRIFFIN
A GRIFFIN LAWYERS
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409.763.4102

RE: CIVIL ACTION NO. 4:08-CV-1908; ANN MARIE ROSE BAKER,
M.D., PLAINTIFF V. UNIVERSITY OF TEXAS HEALTH SCIENCE
CENTER, ET AL., DEFENDANTS; IN THE UNITED STATES
DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS -
HOUSTON DIVISION

(DEPOSITIONS/DISCOVERY)

NO. OF PAGES FAXED - (inclusive of cover)

(I write this document seeking dates for depositions of the
following below stated persons. The need the following
depositions, to-wit:

First Group.

- David Kusnerik, Director, GME Programs (2 hours)*
- Dr. Crandell (1/2 day)
- Dr. Meslin Woldensenbet (2 hours)
- Dr. Tsakiri (1 hour)
- Dr. Michelle Barratt (1 hour).

Depending upon the discovery and extent of discovery with respect to the listed five (5) depositions above, we may find it necessary to take short depositions of all attendees of Plaintiff when she was in the program. The areas to cover are their reports, whether Dr. Baker failed their particular rotation, and general background information. The short depositions may include the following persons:

Second Group.

- Dr. Mark Hormann (30 - 45 minutes);
- Dr. Dr. Johnnie Frazier (30 - 45 minutes);
- Dr. Brenda Morris (30 - 45 minutes);
- Dr. J. Marc Rhoads (30 - 45 minutes);
- Dr. Jennifer Feldman (30 - 45 minutes);
- Dr. Nathaneil Strobels (30 - 45 minutes);
- Dr. Richard Frye (30 - 45 minutes);
- Dr. Deborah Brown (30 - 45 minutes);
- Dr. Thomas G. Cleary (30 - 45 minutes)
- Dr. Suzanne Lopez (30 - 45 minutes);
- Dr. James Stark (30 - 45 minutes);
- Dr. Mark Farnie (30 - 45 minutes);
- Dr. Mohammad Zuhri-Yafi (30 - 45 minutes);
- Dr. Lakshmi Atkur (30 - 45 minutes);
- Dr. Mohinder Thapar (30 - 45 minutes);
- Dr. Robin Williams (30 - 45 minutes);
- Dr. Laura Lingle (30 - 45 minutes);
- Dr. Laura Worth (30 - 45 minutes);
- Dr. Renee Madden (30 - 45 minutes);
- Dr. R. Beverly Raney (30 - 45 minutes);

* Anticipated time that will take to depose person.

- Dr. Cynthia Herzog (30 - 45 minutes);
- Dr. Rosemary M. Conlon (30 - 45 minutes);
- Dr. Kim Smith (30 - 45 minutes);
- Dr. John Sparks (30 - 34 minutes).

Third Group.

- Dr. Cea Tllis (1 hour)
- Dr. Laura Benjamin (1 hour)
- Dr. Jacie Ruggero (1 hour)
- Dr. Wen Pham (1 hour)

If you provide a couple of days in May that the first group of depositions can be done, it would be appreciated. Thank you.)

If you have difficulty receiving this transmission or any part thereof, please call 409.763.0386.

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